

MARKS, O'NEILL, O'BRIEN, DOHERTY & KELLY, P.C.

Sean X. Kelly

Melissa J. Brown

Sean Robins

Cherry Tree Corporate Center

Suite 501

535 Route 38 East

Cherry Hill, New Jersey 08002

Tel: (856) 663-4300

WILFORD CONRAD LLP

David A. Wilford

Christopher T. Conrad

Sabina B. Danek

18 East Dundee Road

Building 6, Suite 150

Barrington, Illinois 60010

Tel: (224) 848-4723

Attorneys for Defendants Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB146013, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500612, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500642, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500626, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500618, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500629, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500630, Certain Underwriters at Lloyd's, London subscribing to Policy No. 15G142820113, and Chubb Insurance Company of Canada

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; VALEANT
PHARMACEUTICALS INTERNATIONAL; and
AGMS, INC.,

Plaintiffs,

v.

AIG INSURANCE COMPANY OF CANADA;

Civil Action No.: 3:18-cv-00493

Hon. Michael Shipp

**CERTIFICATION OF MELISSA
J. BROWN, ESQUIRE IN
SUPPORT OF APPLICATION**

ACE INA INSURANCE COMPANY; ALLIANZ GLOBAL RISKS US INSURANCE COMPANY; ARCH INSURANCE CANADA LTD; EVEREST INSURANCE COMPANY OF CANADA; HARTFORD FIRE INSURANCE COMPANY; IRONSHORE CANADA LTD.; LIBERTY INTERNATONAL UNDERWRITERS, a division of LIBERTY MUTUAL INSURANCE COMPANY; LIBERTY MUTUAL INSURANCE COMPANY; LLOYD'S UNDERWRITERS; LLOYD'S CONSORTIUM 9885 (a/k/a STARR FINANCIAL LINES CONSORTIUM 9885); LLOYD'S SYNDICATE ANV 1861; LLOYD'S SYNDICATE AMA 1200; LLOYD'S SYNDICATE ARGO 1200; LLOYD'S SYNDICATE AWH 2232; LLOYD'S SYNDICATE BRT 2987; LLOYD'S SYNDICATE CVS 1919; LLOYD'S SYNDICATE HCC 4141; LLOYD'S SYNDICATE MITSUI 3210; LLOYD'S SYNDICATE MIT 3210; LLOYD'S SYNDICATE NAV 1221; LLOYD'S SYNDICATE QBE 1886; LLOYD'S SYNDICATE SJC 2003; ROYAL & SUN ALLIANCE INSURANCE COMPANY OF CANADA; TEMPLE INSURANCE COMPANY; and XL INSURANCE COMPANY SE,

Defendants.

**FOR PRO HAC VICE
ADMISSION OF
CHRISTOPHER T. CONRAD,
ESQUIRE, DAVID A. WILFORD,
ESQUIRE, AND SABINA B.
DANEK, ESQUIRE**

I, Melissa J. Brown, Esquire of full age, hereby certify as follows:

1. I am a partner of the firm of Marks, O'Neill, O'Brien, Doherty & Kelly, LLC., co-counsel for Defendants, Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, incorrectly named as "Lloyd's Syndicate CVS 1919," Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913, incorrectly named as "Lloyd's Syndicate QBE 1886" and "Lloyd's Syndicate ANV 1861," Certain Underwriters at Lloyd's, London subscribing to Policy

No. QB146013, incorrectly named as "Lloyd's Syndicate Mitsui 3210," Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500612, incorrectly named as "Lloyd's Consortium 9885 (a/k/a Starr Financial Lines Consortium 9885)" and "Lloyd's Syndicate QBE 1886," Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500642, incorrectly named as "Lloyd's Syndicate Argo 1200," Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500626, incorrectly named as "Lloyd's Syndicate MIT 3210," Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500618, incorrectly named as "Lloyd's Syndicate QBE 1886," "Lloyd's Syndicate ANV 1861" and "Lloyd's Syndicate NAV 1221," Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500629, incorrectly named as "Lloyd's Syndicate MIT 3210" and "Lloyd's Syndicate AMA 1200," Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500630, incorrectly named as "Lloyd's Syndicate BRT 2987" and "Lloyd's Syndicate NAV 1221," Certain Underwriters at Lloyd's, London subscribing to Policy No. 15G142820113, incorrectly named as "Lloyd's Syndicate HCC 4141," and Chubb Insurance Company of Canada, formerly known as ACE INA Insurance Company (collectively, the "Represented Defendants"), in the above captioned matter. I submit this certification to the Court in support of the Represented Defendants' application for an Order allowing the *pro hac vice* admission of Christopher T. Conrad, Esquire, David A. Wilford, Esquire, and Sabina B. Danek, Esquire, pursuant to Local Civil Rule 101.1(c), for purposes of this pending action before the Court.

2. I am a member in good standing of the bar of the State of New Jersey and the United State District Court for the District of New Jersey. I, or another attorney at Marks, O'Neill, O'Brien, Doherty & Kelly, who is a member in good standing of the bar of the State of New Jersey

and the United States District for the District of New Jersey, will sign all pleadings, briefs and other papers filed with the Court on behalf of the Represented Defendants in this matter and will be present for all appearances before the Court unless previously excused from appearing by the Court, and will comply with Local Civil Rule 101.1(c).

3. Plaintiffs have no objection to the admission *pro hac vice* of Christopher T. Conrad, Esquire, David A. Wilford, Esquire, and Sabina B. Danek, Esquire.

4. For the foregoing reasons and those set forth in the accompanying Certifications of Christopher T. Conrad, Esquire, David A. Wilford, Esquire, and Sabina B. Danek, Esquire, it is respectfully requested that the Court execute the attached Consent Order and admit Christopher T. Conrad, Esquire, David A. Wilford, Esquire, and Sabina B. Danek, Esquire *pro hac vice* for the purpose of representing the Represented Defendants in this litigation.

I hereby certify under penalty of perjury under the laws of the United States of America that the foregoing statements made by me are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: February 2, 2018

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

By: Melissa J. Brown

Melissa J. Brown, Esquire

Attorney for Defendants Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB146013, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500612, Certain Underwriters at Lloyd's, London subscribing to Policy No.

B0509FINMW1500642, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500626, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500618, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500629, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500630, Certain Underwriters at Lloyd's, London subscribing to Policy No. 15G142820113, and Chubb Insurance Company of Canada